

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Claudia A. Nesmith,

Debtor.

Case No. 22-13283-AMC
Chapter 13

Motion to Modify Plan After Confirmation

Debtor Claudia A. Nesmith, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on December 7, 2022.
2. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
3. The Debtor wants to modify the plan to cure the arrearage.
4. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 50 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 19, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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